

August 31, 2015

VIA ELECTRONIC FILING

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court for the District of New Jersey
Courtroom MLK5D
Martin Luther King Building and U.S. Courthouse
50 Walnut Street Room 4C
Newark, New Jersey 07101

Re: *Casagrand, et al. v. Gannet Co., Inc. et al.*
U.S. District Court, District of New Jersey, No. 2:14-cv-00022

Dear Judge Waldor:

Plaintiffs Richard Casagrand and Dylan Schlossberg, along with Defendants Gannett Co. Inc. and Marketing Plus, Inc. (collectively, the "Parties") write to update the Court on the status of their settlement discussions.

As the Court is aware, on April 7, 2015, the Parties submitted a joint letter informing the Court that they had agreed to attend a mediation before the Honorable Lane Phillips (ret.) of Phillips ADR, with a date to be determined, and requesting that the Court stay discovery in this matter in order to conserve the resources of the Parties and the Court. (Dkt. 46.) As a result, discovery in this matter was stayed, and mediation with Judge Phillips was subsequently scheduled to occur on June 26, 2015. Although the Parties had every intention of proceeding with the mediation as scheduled, on June 30, 2015, the Parties submitted a joint letter informing the Court that, while they had continued to prepare for the mediation, the Parties needed additional time to exchange information relevant to their settlement efforts. (Dkt. 48.) The Parties also informed the Court that, given Judge Phillip's limited availability and travel schedule, the Parties agreed that they would select a different mediator.

The Parties have now selected The Honorable Judge Wayne R. Andersen (ret.) of JAMS ✓ to proceed over the mediation of this matter on October 28, 2015. Additionally, Defendants have provided Plaintiffs' counsel with additional information, which will allow the Parties to have a more meaningful discussion at the upcoming mediation. As such, and in effort to continue to conserve the resources of the Parties and the Court, the Parties respectfully request that the Court ✓ continue the stay of discovery in this matter until one (1) week after the October 28, 2015 mediation, at which point the Parties will submit a further joint report regarding the status of their mediation efforts. Alternatively, should the Court have any questions about the instant request, the Parties respectfully request a brief telephone conference with the Court to discuss these issues and the litigation moving forward.

★ This matter is hereby stayed until Friday, November 6, 2015, pending mediation. The parties shall submit a joint report regarding the status of mediation by that date.

s/Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.

Date: 9/2/15